


**CERCLA SECTION 103 and EPCRA SECTIONS 302 - 312 INSPECTION REPORT**  
**\*\*\*CONFIDENTIAL BUSINESS INFORMATION\*\*\***

<p align="center"><b>PREPARED BY:</b> (b) (4) (b) (4) (b) (4) Cherokee Nation Assurance, LLC Contract Number: EP-S3-14-01</p>	<p align="center"><b>PREPARED FOR:</b> U.S. Environmental Protection Agency, Region III Hazardous Site Cleanup Division Oil &amp; Prevention Branch</p>
<p align="center"><b>SIGNED BY:</b> (b) (4) Lead Inspector (b) (4) Eric D. Bailey Program Manager</p>	<p align="center"><b>APPROVED BY:</b>  Renee Bryant Acting Chief Oil and Prevention Enforcement Section, U.S. Environmental Protection Agency, Region III Date 9/17/19</p>

<b>I. FACILITY</b>	Bulk Chemicals Inc. 809 Mohrsville Road Mohrsville, Pennsylvania 19541
<b>CONTACT</b>	Mr. Harry Adams
<b>TELEPHONE NO.</b>	(800) 338-2855
<b>EMAIL ADDRESS</b>	hadams@bulkchemicals.us
<b>SIC Code:</b> 2819	
<b>NAICS Code:</b> 325998	
<b>II. DATE OF INSPECTION</b>	July 25, 2019
<b>III. PURPOSE OF INSPECTION</b>	CERCLA Section 103 and EPCRA Sections 302-312 Inspection
<b>IV. CASE NUMBER</b>	03-PA-2019-019
<b>V. INSPECTORS</b>	(b) (4)
<b>EPA REPRESENTATIVE</b>	Ms. Kelley Chase, On-Scene Coordinator
<b>PADEP REPRESENTATIVE</b>	Mr. Chris Bosnyak, Emergency Response Coordinator
<b>VI. FACILITY REPRESENTATIVES</b>	Mr. Harry Adams, President Mr. Michael Rowley, EHS Mr. Timothy Fudge, IT/IS Mr. David Heffelfinger, 1 <sup>st</sup> Shift Supervisor Mr. Justin Lineman, Lewis Environmental Mr. Geoff Kristof, Aquaterra

## VII. OPENING CONFERENCE

### 1. OPENING CONFERENCE AND GENERAL INSPECTION PROCEDURES

The U.S. Environmental Protection Agency (EPA) selected the Bulk Chemicals Inc. (Bulk) facility for an inspection based on information received by the Region 3 Emergency Planning and Community Right-to-Know Act (EPCRA) Coordinators, Mr. Perry Pandya and Ms. Theresa Gallagher, regarding a release of nitric acid that occurred at the Bulk facility located at 809 Mohrsville Road in Mohrsville, Pennsylvania.

According to National Response Center (NRC) Incident Report No. 1248397, the Bulk facility in Mohrsville, Pennsylvania had a release of two thousand two hundred (2,200) gallons of nitric acid on June 9, 2019 at 7:30 p.m. (1930 hours) and reported that release to the NRC on June 10, 2019 at 12:32 p.m. (1232 hours), a delay of approximately seventeen (17) hours and two (2) minutes.

Nitric acid [Chemical Abstracts Service (CAS) Number 7697-37-2] is a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) hazardous substance and an EPCRA Extremely Hazardous Substance (EHS) with a Reportable Quantity (RQ) of one thousand (1,000) pounds.

On July 3, 2019, (b) (4) Cherokee Nation Assurance LLC (CNA) contacted the listed telephone number of the Bulk facility and spoke with Mr. Harry Adams (Bulk), President. (b) (4) CNA indicated that EPA Region 3 had requested that a CERCLA Section 103 and EPCRA Sections 302, 303, 304, 311, and 312 inspection be conducted at the Bulk facility located at 809 Mohrsville Road in Mohrsville, Pennsylvania regarding a release of nitric acid that occurred on June 9, 2019. (b) (4) CNA and Mr. Adams (Bulk) agreed on an inspection date of July 25, 2019 at 9:00 a.m. (0900 hours). On June 17, 2019, Ms. Gallagher (EPA) sent a letter to Mr. Adams (Bulk) confirming the date and time of this inspection.

The following table summarizes the date and contact information pertaining to the Certified Statements sent by (b) (4) CNA requesting the EPCRA reporting status of the Bulk facility for reporting years 2016, 2017, and 2018:

Date	Contact Name	Agency	
7/18/19	Mr. Michael Manley	Pennsylvania Emergency Management Agency	SERC
7/18/19	Ms. Carol Freeman	PENNSAFE	SERC
7/18/19	Ms. Megan Young-Kraft	Berks County Department of Emergency Services – Emergency Management	LEPC
7/18/19	Rusty Wagner	Shoemakersville Fire Department	Local Fire Department

(b) (4) 25, 2019 at 9:00 a.m. (0900 hours), the inspectors (b) (4) CNA and (b) (4) CNA, met with facility representatives, Mr. Adams (Bulk); Mr. Michael Rowley (Bulk), EHS; Mr. Timothy Fudge (Bulk), IT/IS; Mr. David Heffelfinger (Bulk), 1<sup>st</sup> Shift Supervisor; Mr.

Justin Lineman, consultant for Lewis Environmental (Lewis); and Mr. Geoff Kristof, principal for Aquaterra, at the Bulk facility located at 809 Mohrsville Road in Mohrsville, Pennsylvania to conduct the opening conference of the CERCLA Section 103 and EPCRA Sections 302 through 312 inspection. Also in attendance at the inspection was Ms. Kelley Chase, On-Scene Coordinator for EPA, and Mr. Chris Bosnyak, Emergency Response Coordinator for the Pennsylvania Department of Environmental Protection (PADEP).

(b) (4) CNA) read a statement explaining the purpose and potential activities of the CERCLA and EPCRA inspection of the facility. The statement read is provided below:

The United States Environmental Protection Agency, its employees, agents, contractors and authorized representatives, are present for the purpose of conducting an inspection at the Bulk facility to evaluate the Facility's compliance with Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. Section 9603, and Sections 302, 303, 304, 311, and 312 of the Emergency Planning and Community Right-to-Know Act, 42 U.S.C. Sections 11002, 11003, 11004, 11021, and 11022. Your consent is requested for entry to the Facility property, including any and all buildings and structures located on the property where entry is needed to complete the inspection, to make visual observations, examine equipment, take still photographs, take video (including sound), inspect and copy documents, and conduct other activities necessary to complete the inspection.

Mr. Adams (Bulk) stated that he was authorized on behalf of Bulk to approve facility access to the inspectors to perform the described inspection, and also stated that he consented to the inspectors' entry to the facility to perform the inspection as described by (b) (4) CNA).

The inspectors' credentials were presented and a Notice of Inspection was presented and explained. Mr. Adams (Bulk) signed the notice, and an outline of the areas to be investigated was discussed. (b) (4) CNA) informed Mr. Adams (Bulk) that the inspectors would be recording all documents provided to the inspectors by the Bulk representatives on the Receipt for Samples and Documents.

During the opening conference, the inspectors advised the company representatives of the procedures necessary for asserting a confidentiality claim in accordance with Title 40 of the Code of Federal Regulations (40 CFR) Part 2, Subpart B. The inspectors advised the facility representatives that a document specific claim of Confidential Business Information (CBI) must be made during the inspection and would be documented on the Receipt for Samples and Documents. The inspectors advised the company representatives that a written request in accordance with 40 CFR Part 2, Subpart B, must be sent to the EPA Region 3 EPCRA Coordinator, Ms. Gallagher, to assert a formal confidentiality claim. At the time of the inspection, the facility asserted a confidentiality claim.

(b) (4) CNA) informed the facility representative that the inspectors would be photo-documenting the tour of the facility. Throughout the inspection (b) (4) CNA) reviewed with the facility representatives the regulatory guidance pertaining to Section 103 of CERCLA and Sections 302, 303, 304, 311, and 312 of EPCRA.

Following the opening conference, the inspectors discussed site background information with the facility representatives. The inspectors then collected information about the June 9, 2019 nitric acid release, and also discussed Sections 302, 303, 311, and 312 of EPCRA with the facility



representatives. A site walk-through was then conducted of the area where the release occurred.

## 2. FACILITY DESCRIPTION, OPERATIONS, AND CORPORATE INFORMATION

On July 15, 2019, the inspector contacted the Bulk facility with a request for documents and information to have available for review during the EPCRA inspection and to photocopy prior to the conclusion of the EPCRA inspection. During the inspection, the inspectors reviewed the following facility description, operations, and corporate information onsite:

- Background Information.

The Background Information was reviewed by the inspectors during the inspection and included the year the business began, the state of incorporation, the number of employees, the Standard Industrial Classification (SIC) Code and North American Industrial Classification Standard (NAICS) Code, the headquarters location, branch locations, the annual revenue for 2018, and company officials.

Mr. Adams (Bulk) stated that the corporate name of the company is Bulk Chemicals Inc., but that their industry name is BCI Surface Technologies. Bulk supplies chemicals to the metal finishing industry. Raw materials are brought onsite and Bulk blends the chemicals, often with water, prior to reselling them to their customers.

According to Mr. Adams (Bulk), Bulk was incorporated in 1974 in the state of Pennsylvania.

Mr. Adams (Bulk) stated that Bulk leases a warehouse facility located in [redacted] Pennsylvania. In addition, Bulk owns another facility in [redacted] Pennsylvania that began manufacturing operations after the June 9, 2019 nitric acid release. In addition, Bulk has warehouses in [redacted] There is no chemical storage at the Reading, Pennsylvania headquarters location.

The facility operates Monday to Friday from 7:00 a.m. (0700 hours) to 10:00 p.m. (2200 hours). There are twelve (12) to thirteen (13) employees at the Mohrsville location on a daily basis.

According to Bulk facility representatives, Bulk owns the facility property and does not have any tenants onsite. There are no rail lines onsite.

Mr. Adams (Bulk) stated that the facility does not have air or water permits. In addition, there is no discharge from the property. All materials are hauled away as hazardous or non-hazardous waste.

The remainder of the inspection focused on collecting specific information regarding the June 9, 2019 nitric acid release and determining if the facility had present any EHSs and hazardous chemicals above the Threshold Planning Quantities (TPQs) or thresholds for the applicable calendar years, 2016, 2017, and 2018, in addition to a facility tour.

## VIII. INSPECTION CONFERENCE

### 1. SECTIONS 302 AND 303 OF EPCRA

During the inspection, Bulk facility representatives indicated to the inspectors that the facility stored EHSs onsite in quantities greater than their TPQs during calendar years 2016, 2017, and

2018.

The Bulk facility representatives were unable to locate initial submissions pursuant to Sections 302 and 303 of EPCRA. According to the Bulk facility representatives, EHSs and the Facility Emergency Coordinator (FEC) are included in the annual Tier II Report submission.

## **2. SECTION 304 OF EPCRA AND SECTION 103 OF CERCLA**

### **June 9, 2019 Release of Nitric Acid**

On July 15, 2019, the inspector contacted the Bulk facility with a request for documents and information to have available for review during the EPCRA inspection and to photocopy prior to the conclusion of the EPCRA inspection. During the inspection, the inspectors reviewed the following document onsite:

- Release Timeline.

Mr. Adams (Bulk) stated that on May 23, 2019, the Bulk facility ordered three (3) neoprene gaskets to fix a small leak on a five thousand three hundred (5,300) gallon stainless steel nitric acid tank. The tank is located within a sealed cinderblock containment area along with other storage tanks. The repair was made on May 31, 2019. However, the gaskets ordered and installed were incompatible with nitric acid.

According to Mr. Adams (Bulk), on June 3, 2019, forty-four thousand nine hundred eighty (44,980) pounds of sixty-seven (67) percent nitric acid were delivered. The gasket repairs were subsequently observed for leaking on a daily basis.

Mr. Adams (Bulk) stated that on Saturday, June 8, 2019, Mr. David Heffelfinger (Bulk), production supervisor, came in to the facility to check on mixing that was ongoing over the weekend. At this time, Mr. Heffelfinger (Bulk) did not observe a release of nitric acid or nitric acid odors. Mr. Adams (Bulk) stated that there was no one else onsite over the weekend as there was no production at that time.

According to Mr. Adams (Bulk), based upon video footage, the Bulk facility determined that the release of nitric acid from the tank into the containment area began at 6:00 a.m. (0600 hours) on Sunday, June 9, 2019. The nitric acid ultimately exited from the bottom of the containment area and traveled in a northwesterly direction across the floor of the building until it reached the exterior wall. The nitric acid then exited the Bulk building through the exterior wall, and traveled along a paved edge and grass area in a northwesterly direction to Mohrsville Road. Upon reaching the road, the material flowed in a southwesterly direction along Mohrsville Road to a low point at the southwest corner of the Bulk facility.

Mr. Adams (Bulk) stated that at 5:45 p.m. (1745 hours), Mr. Rusty Wagner, Fire Chief for the Shoemakersville Fire Department, was driving by the Bulk facility and observed nitric acid traveling down to the street from the Bulk building. By 6:30 p.m. (1830 hours) to 6:45 p.m. (1845 hours), Mr. Wagner (Fire Department) had advised the Bulk facility of the situation.

Mr. Adams (Bulk) stated that he was onsite from approximately 7:00 p.m. (1900 hours) on June 9, 2019 to 3:30 a.m. (0330 hours) on June 10, 2019.

According to Mr. Adams (Bulk), Berks County Hazmat, assisted by Lehigh County Hazmat,

arrived onsite and ultimately made joint entry into the facility building and stopped the release. Mr. Adams (Bulk) was unable to provide the times that the hazmat teams arrived onsite or made entry to the building.

Mr. Adams (Bulk) stated that evacuations were made within a half (1/2) mile radius at 10:30 p.m. (2230 hours).

Mr. Adams (Bulk) stated that the Pennsylvania Emergency Management Agency (PEMA) and the Pennsylvania Department of Environmental Protection (PADEP) were notified by approximately 7:30 p.m. (1930 hours). It is unknown who notified these agencies.

Mr. Adams (Bulk) stated that two thousand (2,000) gallons of nitric acid in the leaking tank were transferred to an open top mixing tank by the emergency responders.

According to Mr. Adams (Bulk), Sioux Environmental (Sioux) was brought onsite to conduct the exterior response and cleanup. It is unknown what time Sioux arrived onsite; however, Sioux was the first environmental contractor to arrive onsite.

Mr. Adams (Bulk) stated that First Call Environmental (First Call) was onsite by 3:30 a.m. (0330 hours) on June 10, 2019 to complete cleanup in the interior of the Bulk building. First Call planned to neutralize the acid for removal.

According to Mr. Bosnyak (PADEP), he and Mr. Walter Bair (PADEP), Emergency Response Manager, were in the vicinity on the morning of June 10, 2019 and decided to visit the Bulk facility. They were onsite between 7:30 a.m. (0730 hours) and 8:00 a.m. (0800 hours).

Mr. Adams (Bulk) stated that he returned to the Bulk facility at approximately 10:40 a.m. (1040 hours). Just after his arrival, an electrical fire started in the southeast corner of the Bulk building during release clean-up activities due to nitric acid fumes compromising the electrical wiring and equipment. The fire started at 10:44 a.m. (1044 hours).

Mr. Adams (Bulk) stated that in response to the fire, First Call used two (2) fire extinguishers. Mr. Rowley (Bulk) called 911 and the Shoemakersville Fire Department arrived at the facility quickly. Everyone evacuated the Bulk building. By 10:47 a.m. (1047 hours), electric to the building was cut.

According to Mr. Adams (Bulk), the fire department cut two (2) holes in the side of the building for venting and spraying water. A quarter (1/4) mile evacuation was completed in response to the fire. Mr. Adams (Bulk) stated that residents were upset because they had only just returned to their homes from the evacuation the previous night of June 9, 2019.

Mr. Adams (Bulk) stated that the fire melted totes and holding tanks inside of the building, causing some other chemicals to leak inside the building. A two hundred seventy-five (275) gallon tote containing fluorotitanic acid leaked into the building. However, Mr. Adams (Bulk) stated that there was no evidence in samples taken that this material migrated outside of the building. In addition, Mr. Adams (Bulk) was unable to identify which other chemicals, if any, were released within the Bulk building following the nitric acid release and the electrical fire.

According to Mr. Adams (Bulk), cleanup activities resumed following the fire.

Mr. Rowley (Bulk) contacted the NRC on June 10, 2019 at 12:32 p.m. (1232 hours) to report the

nitric acid release. Mr. Adams (Bulk) stated that the State Emergency Response Commission (SERC) (i.e., PEMA) was not notified of the release. Mr. Adams (Bulk) also stated that the Local Emergency Planning Committee (LEPC) was notified in person while onsite for the release response on June 9, 2019.

Mr. Adams (Bulk) stated that the release was initially captured on the southwest corner of the facility. Booms were placed to keep material from leaving the facility property. Rain on Monday, June 10, 2019, caused the material to become diluted and travel offsite. There is a storm drain located down Mohrsville Road. Following the release events, the storm drain was sampled, in addition to a creek located across Mohrsville Road in which the storm drain discharges.

According to Mr. Bosnyak (PADEP), the Berks County EMA, the Berks County Hazmat, and PADEP requested that the OSC respond to the Bulk facility.

Ms. Chase (EPA) stated that she arrived onsite at approximately 7:00 p.m. (1900 hours) on June 10, 2019.

Ms. Chase (EPA) stated that by approximately 3:00 a.m. (0300 hours) to 4:00 a.m. (0400 hours) on June 11, 2019, the Bulk facility contacted Lewis Environmental (Lewis) to respond to the facility. Sioux was relieved of cleanup responsibilities on June 11, 2019 and First Call was relieved on June 12, 2019. However, First Call did not conduct any work on June 11, 2019. After assessing the site, Lewis began work by June 12, 2019.

Ms. Chase (EPA) stated that EPA sampled five (5) local wells following the release event. The preliminary results indicated that the wells were not impacted by the nitric acid release event.

Ms. Chase (EPA) stated that EPA was onsite at the Bulk facility from June 10, 2019 to July 10, 2019. The Emergency Response Team (ERT) conducted air monitoring but did not detect nitric acid.

Mr. Adams (Bulk) stated that one thousand eight hundred fifty (1,850) gallons of nitric acid were released from the leaking nitric acid tank. However, Mr. Adams (Bulk) was unable to provide the inspectors with release calculations.

Mr. Adams (Bulk) stated that he is unable to get in communication with Sioux and First Call. He stated that Sioux hauled away some material, but did not know the quantity of material. Mr. Adams (Bulk) stated that he was not provided with a manifest for the material hauled away.

The containment area was pumped out and the materials were collected in two (2) vac trucks by Miller Environmental. The pH was 5.5. The date that this occurred and the quantity that was collected were not provided to the inspectors.

During the inspection, Mr. Adams (Bulk) stated that chrome was identified as having been released from the building. The inspectors requested that the Bulk facility representatives provide the inspectors with additional information and release quantities of chrome.

At the time of the inspection, Lewis was still onsite completing cleanup and sampling activities. On July 25, 2019, the date of the inspection, Lewis representatives stated that they were coring through seams in the floor to take samples to determine if material was released through the floor.

Mr. Adams (Bulk) stated that since cleanup and remediation are ongoing, sample results regarding



the extent of the release are currently unavailable.

Mr. Adams (Bulk) stated that a written follow-up report was not submitted to the SERC (i.e., PEMA) or the LEPC.

### 3. SECTIONS 311 AND 312 OF EPCRA

The Bulk facility representatives stated that they use the Chempax inventory system. The Bulk facility representatives did not provide the inspectors with a Maximum Storage Quantity (MSQ) List at the time of the inspection.

The Bulk facility was unable to locate submissions pursuant to Section 311 of EPCRA.

The Bulk facility provided the inspectors with Tier II Reports for calendar years 2016, 2017, and 2018.

### 4. FACILITY TOUR

A facility tour was conducted following initial discussions of the release events. The inspectors, accompanied by Bulk facility representatives, walked from the meeting room to the nitric acid tank where the inspector took ten (10) photographs. The inspectors and Bulk facility representatives then walked around the building towards the area where the nitric acid left the Bulk facility building. The inspector took eight (8) photographs in that area. The inspectors and Bulk facility representatives then walked to the upper warehouse where the inspector took one (1) photograph. The facility tour then concluded and the inspectors and Bulk facility representatives returned to the meeting room.

## IX. CLOSING CONFERENCE

At 1:05 p.m. (1305 hours), after conducting the facility tour, the inspectors (b) (4) CNA) and (b) (4) CNA), met with facility representatives, Mr. Adams (Bulk), Mr. Rowley (Bulk), Mr. Fudge (Bulk), Mr. Heffelfinger (Bulk), Mr. Lineman (Lewis), and Mr. Kristof (Aquaterra), at the Bulk facility located at 809 Mohrsville Road in Mohrsville, Pennsylvania to conduct the closing conference of the CERCLA Section 103 and EPCRA Sections 302 through 312 inspection. Also in attendance was Ms. Chase (EPA) and Mr. Bosnyak (PADEP).

The inspectors confirmed with the Bulk facility the following outstanding information and requested that the information be provided within one (1) week:

- Site acreage;
- Scaled facility map;
- Time that Sioux arrived onsite on June 9-10, 2019;
- Maps delineating the areas impacted by the release event;
- Any submissions made pursuant to Section 311 of EPCRA;
- Tier II Report preparation methodology;
- Location maps and hazardous chemical inventories for the (b) (4) CNA locations; Nonresponsive based on revised scope
- Safety Data Sheets (SDSs) for all chemicals listed on the Tier II Reports; and Nonresponsive based on revised scope
- Data regarding chrome released during the release event.

(b) (4) CNA) reminded the Bulk facility representatives of the facility's right to make a CBI claim.



In addition (b) (4) CNA) stated that EPA will provide a copy of the Inspection Report to the Bulk facility within seventy (70) days from the date of the inspection.

(b) (4) CNA) reminded the facility that compliance is the facility's responsibility, and that any identified potential deficiencies or areas of concern are not a final determination of compliance.

(b) (4) CNA) stated that EPA will, after further review, provide subsequent written correspondence describing any potential deficiencies or areas of concern identified during the inspection review process and that EPA reserves the right to bring an enforcement action.

Copies of the Notice of Inspection, the Receipt for Samples and Documents, and the Meeting Sign-In Sheet were made for the Bulk facility's records. Following this, the inspection was completed and the inspectors departed the facility at 1:15 p.m. (1315 hours).

**X. APPENDICES**

- Appendix A: Scanned Copy of the Notice of Inspection
- Appendix B: Scanned Copy of the Receipt for Samples and Documents
- Appendix C: Scanned Copy of the Meeting Sign-In Sheet
- Appendix D: List of Photographs Taken During Inspection

Bulk Chemicals Inc.  
CERCLA Section 103 and EPCRA Sections 302 - 312 Inspection Report  
Case No. 03-PA-2019-019

## **APPENDIX A**

Scanned Copy of the Notice of Inspection



# NOTICE OF INSPECTION U. S. ENVIRONMENTAL PROTECTION AGENCY

Emergency Planning and Community Right-to-Know Act (EPCRA) and the  
Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.	9:00 AM	Bulk Chemicals
7/25/2019	N/A	N/A		
4. INSPECTOR ADDRESS			5. FIRM ADDRESS	
Cherokee Nation Assurance, LLC			809 Mohrsville Road	
P.O. Box 44			Shoemakersville, Pennsylvania	
Trumbauersville, PA 18970				
<p><b>REASON FOR INSPECTION:</b> This inspection is for the purpose of determining compliance with the Emergency Planning and Community Right-to-Know Act of 1986 and Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA). The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical manufacturing, importing, processing, and/or use facilities, including waste handling and treatment operations; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Act.</p> <p>You may, if appropriate, pursuant to Title 40 of the Code of Federal Regulations Section 2.203 paragraph (b) [40 CFR § 2.203(b)], assert a business confidentiality claim covering all or part of the information requested above. Information covered by such a claim will be handled by EPA in accordance with the procedures set forth in Subpart B, 40 CFR Part 2. If no claim of confidentiality accompanies the information requested herein when it is received by EPA, it may be made available to the public by EPA without further notice to the company.</p>				
(b) (4)			RECIPIENT SIGNATURE	
(b) (4)			NAME	
			Harry F. Adams	
TITLE	DATE SIGNED	TITLE	DATE SIGNED	
Inspector	7/25/19	President	7/25/19	



**APPENDIX B**

Scanned Copy of the Receipt for Samples and Documents



RECEIPT FOR SAMPLES AND DOCUMENTS  
U. S. ENVIRONMENTAL PROTECTION AGENCY

Emergency Planning and Community Right-to-Know Act (EPCRA) and the  
Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

Page 1 of 1

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.		
7/25/2019	N/A	N/A	9:00 AM	Bulk Chemicals
4. INSPECTOR ADDRESS			5. FIRM ADDRESS	
Cherokee Nation Assurance, LLC P.O. Box 44 Trumbauersville, PA 18970			809 Mohrsville Road Shoemakersville, Pennsylvania	

The documents and samples of chemical substances and/or materials described below were collected in connection with the administration and enforcement of the Emergency Planning and Community Right-to-Know Act of 1986 and the Comprehensive Environmental Response, Compensation and Liability Act as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA).

RECEIPT OF THE DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED.

NO.	DESCRIPTION	PAGES (single or double)
1	Notice of Inspection	1 S
2	Sign-in sheet	1 S
3	BCI Background Information CBI	1 S
4	BCI timeline	1 S
5	2016 Tier II submission	5 S
6	2017 Tier II submission	10 S
7	2018 Tier II submission	10 9 S

(b) (4)		RECIPIENT SIGNATURE	
		NAME	
		Harry F. Adams	
TITLE	DATE SIGNED	TITLE	DATE SIGNED
Inspector	7/25/19	President	7/25/19

**APPENDIX C**

Scanned Copy of the Meeting Sign-In Sheet



**Meeting Sign-In Sheet**  
EPCRA Inspection

**Facility** Bulk Chemicals  
809 Mohrsville Road  
Shoemakersville, Pennsylvania

**Date:** 7/25/2019

**Time:** 9:00 AM

NAME	TITLE	FIRM	PHONE #
(b) (4) (b) (4)		Cherokee Nation Assurance	(b) (6)
KELLEY CHASE	EPA - OSC	US EPA	(b) (6) (b) (6)
Chris Bosnyak	PA-DEP ER Coordinator	PA DEP ER	717-705-4142
Michael Rowley	Bulk Chemicals - EHS	Bulk Chemicals	484-824-3533
Timothy Fudge	BCI IT/IS	Bulk Chemical	610-512-2997
Hanny Adams	President	Bulk Chemicals	410.336.5824
(b) (4)		Cherokee Nation Assurance	(b) (6)
Josh Lerman	Lewis Environmental	Lewis Env	(484) 571-2988
GEOFF KRISTOF	AQUATERRA / Principal	AQUATERRA	610 368 9479
David Heffelfinger	1st Shift Supervisor	Bulk Chemicals	484 637 6009

## **APPENDIX D**

### **List of Photographs Taken During Inspection**

**List of Photographs Taken During Inspection**

Photograph Log for the Bulk Chemicals Inc. Inspection on July 25, 2019; Claimed CBI? Yes	
Number	Description
Bulk (01)	Gasket on the nitric acid tank
Bulk (02)	Nitric acid tank
Bulk (03)	Nitric acid tank showing the containment area
Bulk (04)	Breach in the containment area that puddled in the warehouse and exited the building
Bulk (05)	Nitric acid traveled along the inside of the containment area
Bulk (06)	Path of the nitric acid release from the breach in the containment area to the exterior wall
Bulk (07)	Outside of the containment area
Bulk (08)	Rack located inside of the building
Bulk (09)	Sulfuric acid tank
Bulk (10)	Opposite rack located inside of the building
Bulk (11)	One thousand (1,000) gallon fuel oil tank
Bulk (12)	Area on the exterior wall of the building where the nitric acid was released
Bulk (13)	View of the exterior release area from the fence
Bulk (14)	View of the exterior release area from the building facing Mohrsville Road
Bulk (15)	View along Mohrsville Road where the release of nitric acid flowed in a southwesterly direction
Bulk (16)	Additional view along Mohrsville Road where the release of nitric acid flowed in a southwesterly direction
Bulk (17)	View of the storm drain along Mohrsville Road located offsite just southwest of the facility
Bulk (18)	View of the outfall from the storm drain located across Mohrsville Road
Bulk (19)	Upper warehouse



